



Jackson Lewis P.C.	ALBANY, NY	GRAND RAPIDS, MI	NAPA, CA	RALEIGH-DURHAM, NC
58 South Service Road	ALBUQUERQUE, NM	GREENVILLE, SC	NEW ORLEANS, LA	RAPID CITY, SD
Suite 410	ATLANTA, GA	HARTFORD, CT	NEW YORK, NY	RICHMOND, VA
Melville, New York 11747	AUSTIN, TX	HOUSTON, TX	NORFOLK, VA	SACRAMENTO, CA
Tel 631 247-0404	BALTIMORE, MD	INDIANAPOLIS, IN	OMAHA, NE	SAINT LOUIS, MO
Fax 631 247-0417	BIRMINGHAM, AL	JACKSONVILLE, FL	ORANGE COUNTY, CA	SAN DIEGO, CA
www.jacksonlewis.com	BOSTON, MA	LAS VEGAS, NV	ORLANDO, FL	SAN FRANCISCO, CA
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	DENVER, CO	MINNEAPOLIS, MN	PORTSMOUTH, NH	WHITE PLAINS, NY
	DETROIT, MI	MORRISTOWN, NJ	PROVIDENCE, RI	

MY DIRECT DIAL IS: (631) 247-4647
 MY EMAIL ADDRESS IS: ADAM.GUTTELL@JACKSONLEWIS.COM

October 14, 2014

VIA ECF

Magistrate Judge James Orenstein
 United States District Court, Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, New York 11201

Re: Lisa Fisher v. Mermaid Manor Home for Adults
Case No. 14-cv-3461 (WFK)(JO)

Dear Magistrate Judge Orenstein:

We represent Defendant Mermaid Manor Home for Adults in the above-referenced matter; and, on behalf of both parties, we submit the attached proposed Joint Discovery Plan pursuant to Part II(C) of the Case Management and Scheduling Order.

Very truly yours,

JACKSON LEWIS P.C.

Adam G. Guttell

AGG/laf
 Attachment

cc: Casey J. Wolnowski, Esq. (*via ECF*)

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): October 16, 2014
2. Deadline for first request for production of documents and first request for interrogatories: November 17, 2014
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) N/A; defendant(s) N/A
3. Date for completion of any joinder of additional parties and amendment of the pleadings: January 13, 2015
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) TBD; defendant(s) TBD
4. Number of depositions by plaintiff(s) of: parties 1; non-parties TBD
5. Number of depositions by defendant(s) of: parties 1; non-parties 2
6. Date of status conference (joint status report due two business days in advance): July 14, 2015
7. Date for completion of factual discovery: July 14, 2015
8. Are expert witnesses needed? Yes No X*
 - 8(a). Number of expert witnesses, if any, of plaintiff(s): medical N/A; non-medical N/A
 - 8(b). Date for completion of those expert reports: N/A
 - 8(c). Number of expert witnesses, if any, of defendant(s): medical N/A; non-medical N/A
 - 8(d). Date for completion of those expert reports: N/A
9. Date for completion of expert discovery: N/A
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): August 14, 2015
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: None

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:
-
- Summary Judgment
October 16, 2015
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes X No ____
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes ____ No N/A
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes ____ No X